FILED
AUG 1 8 2008
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

August 8, 2008

Clerk U.S. District Court
Southern District of California
4290 Edward J. Schwartz Federal Bldg.
880 Front Street
San Diego, CA 92101-8900

'08 CR 2772 JLS

RE: United States of America vs Jorge A. Rodriguez Sanchez
Cr. No. 08-285(EDPA)

Dear Clerk:

We herewith enclose the original record, together with a certified copy of the docket entries, in the above captioned case which has been transferred to your District pursuant to Rule 20 Consent to Transfer of Case for Plea and Sentence(Under Rule 20).

Kindly acknowledge receipt on the copy of the letter provided.

Very truly yours,

MICHAEL E. KUNZ
Clerk of Court

By: James Hamilton
James Hamilton, Deputy Clerk

Received above material or record file this day of ,

Signature: ____________________
Date: ____________________

crf1

Cf

FILED
AUG 18 2008
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
) Criminal Case No. 08CR00285-GP-1
Plaintiff,)
v.)
)
JORGE A. RODRIGUEZ SANCHEZ,)
)
Defendant.)

'08 CR 2772 JLS

FILED
AUG - 7 2008
MICHAEL E. KUNZ, Clerk
By Dep. Clerk

2008 JUL -7 P 12:15
U.S. DEPT. OF JUSTICE
US ATTORNEY E.D. OF PA

Consent to Transfer of Case
for Plea and Sentence
(Under Rule 20)

I, **JORGE A. RODRIGUEZ SANCHEZ**, defendant, have been informed that an indictment (*indictment, complaint*) is pending against me in the above designated cause. I wish to plead guilty (*guilty, nolo contendre*) to the offense charged, to consent to the disposition of the case in the Southern District of California in which I am held (*am under arrest, am held*) and to waive trial in the above captioned District.

Dated: 29 MAY 08, at San Diego, CA

Jorge Alan Rodriguez Sanchez
JORGE A. RODRIGUEZ SANCHEZ
(*Defendant*)

(*Witness*)

(*Counsel for Defendant*)

Approved

First Assistant U.S. Attorney

for

United States Attorney for the
Eastern District of Pennsylvania

Karen P. Hewitt 7/3/08
KAREN P. HEWITT
United States Attorney for the
Southern District of California

2008 AUG -6 A 11:12
U.S. DEPT. OF JUSTICE
US ATTORNEY E.D. OF PA

1

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GP

UNITED STATES OF AMERICA : CRIMINAL NO. 08-285

v. : DATE FILED: May 21, 2008

JORGE A. RODRIGUEZ SANCHEZ : VIOLATIONS:

21 U.S.C. § 846 (conspiracy to distribute controlled substances and use a communication facility to facilitate the distribution of controlled substances - 1 count)
21 U.S.C. § 841 (distribution of controlled substances - 4 counts)
Notice of forfeiture

FILED
MAY 21 2008
MICHAEL E. KUNZ, Clerk
By ______ Dep. Clerk

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

INTRODUCTION

1. The Controlled Substances Act ("CSA") governed the manufacture, distribution, and dispensing of controlled substances in the United States.

2. Various prescription drugs were scheduled as controlled substances, pursuant to the CSA. There were five schedules of controlled substances, denominated as Schedules I through V. Drugs were placed on schedules based on their potential for abuse, among other things. Drugs were placed on Schedule II when abuse of them may lead to severe psychological or physical dependence, on Schedule III when abuse of them may lead to moderate or low physical dependence or high psychological dependence, on Schedule IV when abuse of them may lead to more limited physical dependence or psychological dependence when

compared to substances on Schedule III.

3. Federal regulations required that, for a prescription for a controlled substance to be effective, it must be issued for a legitimate medical purpose by a medical practitioner acting in the usual course of his professional practice. A prescription not issued in this manner was not valid. Medical practitioners issuing such purported prescriptions and pharmacists knowingly filling such purported prescriptions were subject to the penalties provided for in the CSA.

4. Controlled substances may only be handled, imported, distributed, or dispensed by persons registered with the United States Attorney General, through the Drug Enforcement Administration ("DEA") to do so, with some exceptions, such as delivery persons. Defendant JORGE A. RODRIGUEZ SANCHEZ was not registered with the DEA to handle, import, distribute, or dispense controlled substances.

5. Oxycodone is a Schedule II controlled substance and is commonly sold under the brand names Oxycontin, Percocet, and Endocet.

6. Hydrocodone is an analgesic agent and a Schedule II controlled substance. When combined with analgesics such as acetaminophen, it is classified as a Schedule III controlled substance. It is commonly sold as a Schedule III controlled substance under the brand name Vicodin.

7. Methylphenidate is a central nervous system stimulant and Schedule II controlled substance. It is commonly sold under the brand name Ritalin.

8. Diazepam and alprazolam are central nervous system depressants and Schedule IV controlled substances, commonly sold under the brand names Valium and Xanax.

9. From at least in or about June 2002 through on or about April 9, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendant

JORGE A. RODRIGUEZ SANCHEZ

conspired and agreed, with others known and unknown to the grand jury, to: (a) knowingly and intentionally distribute controlled substances, including, but not limited to oxycodone, a Schedule II controlled substance, hydrocodone, a Schedule II and III controlled substance, methylphenidate, a Schedule II controlled substance, diazepam, a Schedule IV controlled substance, and alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); and (b) use a communication facility in facilitating the knowing and intentional distribution of controlled substance, in violation of Title 21, United States Code, Section 843(b).

MANNER AND MEANS

It was a part of the conspiracy that:

10. The e-mail address pharmavet@hotmail.com was listed on websites which advertised controlled and non-controlled prescription drugs for sale.

11. Customers sent orders for controlled substances to the e-mail address pharmavet@hotmail.com, which was used by defendant JORGE A. RODRIGUEZ SANCHEZ. Once the terms of the transactions were agreed upon, the customers were requested to wire the payments for the drugs to defendant RODRIGUEZ SANCHEZ and others known and unknown to the grand jury via Western Union and send the identification number provided by Western Union, called a Money Transaction Control Number ("MTCN"), to pharmavet@hotmail.com.

12. Defendant JORGE A. RODRIGUEZ SANCHEZ sold controlled substances and other drugs to customers without requiring a prescription or physical examination by a licensed physician.

13. The money sent by the customers in payment for the controlled substances and drugs was picked up by others known and unknown to the grand jury at a Western Union location in Mexico.

14. Defendant JORGE A. RODRIGUEZ SANCHEZ caused the controlled substances and other drugs to be shipped from Southern California via the United States Mail, United Parcel Service, Federal Express, or DHL to customers in the United States, including the Eastern District of Pennsylvania.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 17, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JORGE A. RODRIGUEZ SANCHEZ

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of oxycodone, that is, approximately 50 10-mg tablets of Endocet, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 11, 2006, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JORGE A. RODRIGUEZ SANCHEZ

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of oxycodone, that is, approximately 25 80-mg tablets of Oxycontin, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 1, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JORGE A. RODRIGUEZ SANCHEZ

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of oxycodone, that is, approximately 30 80-mg tablets of Oxycontin, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

JORGE A. RODRIGUEZ SANCHEZ

knowingly and intentionally distributed, and aided and abetted and willfully caused the distribution of a mixture and substance containing a detectable amount of methylphenidate, that is, approximately 240 10-mg tablets of Ritalin, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendant

JORGE A. RODRIGUEZ SANCHEZ

shall forfeit to the United States of America:

(A) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses; and

(B) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of $1.5 million.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

(A) cannot be located upon the exercise of due diligence;

(B) has been transferred or sold to, or deposited with, a third party;

(C) has been placed beyond the jurisdiction of the Court;

(D) has been substantially diminished in value; or

(E) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney

CLOSED

United States District Court
Eastern District of Pennsylvania (Philadelphia)
CRIMINAL DOCKET FOR CASE #: 2:08-cr-00285-GP-1
Internal Use Only

Case title: USA v. RODRIGUEZ SANCHEZ

Date Filed: 05/21/2008
Date Terminated: 08/07/2008

Assigned to: HONORABLE GENE E.K. PRATTER

Defendant (1)

JORGE A. RODRIGUEZ SANCHEZ

TERMINATED: 08/07/2008

Pending Counts	**Disposition**
None	

Highest Offense Level (Opening)

None

Terminated Counts	**Disposition**
21:846- CONSPIRACY TO DISTRIBUTE CONTROLLED SUBSTANCE AND USE A COMMUNICATION FACILITY TO FACILITATE THE DISTRIBUTION OF CONTROLLED SUBSTANCE. (1)	DISMISSED.
21:841(a)(1),(b)(1)(C) DISTRIBUTION OF OXYCODONE AND METHYLPHENIDATE AND 18:2 AIDING AND ABETTING. (2-5)	DISMISSED.

Highest Offense Level (Terminated)

Felony

A TRUE COPY CERTIFIED TO FROM THE RECORD
DATED: 8-8-08
ATTEST: [signature]
DEPUTY CLERK, UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

Complaints | **Disposition**

None

Plaintiff

USA represented by **FRANK R. COSTELLO**
UNITED STATES ATTORNEY'S OFFICE
615 CHESTNUT STREET
SUITE 1250
PHILADELPHIA, PA 19106
215-861-8442
Email: frank.costello@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
05/27/2008	1	INDICTMENT as to JORGE A. RODRIGUEZ SANCHEZ (1) count(s) 1, 2-5. (rs,) (Entered: 05/27/2008)
08/07/2008	2	CONSENT TO TRANSFER JURISDICTION (Rule 20) to Southern District of California Counts closed as to JORGE A. RODRIGUEZ SANCHEZ (1) Count 1,2-5. (jh,) (Entered: 08/08/2008)
08/07/2008		(Court only) ***JS-3 Closing Information, ***Case Terminated as to JORGE A. RODRIGUEZ SANCHEZ, ***Procedural Interval start as to JORGE A. RODRIGUEZ SANCHEZ (jh,) (Entered: 08/08/2008)
08/07/2008		(Court only) ***Update Disposition Information: (jh,) (Entered: 08/08/2008)